

DISCOVERY PLAN WORKSHEET
Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations: 8/9/2016

Completion date for Phase I Discovery as agreed upon by the parties: 9/26/2016
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

Status conference date TBD by the Court: _____
(Generally 15 days post Phase I Discovery)

Phase II Discovery and Motion Practice

Motion to join new parties or amend the pleadings: 8/8/2016
(Presumptively 15 days post status conference)

First requests for production of documents and for interrogatories due by: 11/11/2016
(Presumptively 15 days post joining/amending)

All fact discovery completed by: 4/27/2017
(Presumptively 3.5 months post first requests for documents/interrogatories)

Exchange of expert reports completed by: n/a
(Presumptively 30 days post fact discovery)

Expert depositions completed by: n/a
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: 5/26/2017
*(Parties are directed to consult the District Judge's individual rules regarding such motion practice.
Presumptively 30 days post expert depositions)*

COMPLETION OF ALL DISCOVERY BY: 4/27/2017
(Presumptively 9 months after Initial Conference)

Submission of joint pre-trial order: 6/26/2017

Final Pre-Trial Conference TBD by the Court: _____